

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CR 23-163 KMM/LIB

| | | |
|---------------------------|---|-----------------------------|
| UNITED STATES OF AMERICA, |) | INDICTMENT |
| |) | |
| Plaintiff, |) | 18 U.S.C. § 922(g)(1) |
| |) | 18 U.S.C. § 924(a)(8) |
| v. |) | 18 U.S.C. § 924(c)(1)(A)(i) |
| |) | |
| DEON NECOLE WILLIAMS, |) | |
| a/k/a "Ghost," |) | |
| |) | |
| Defendant. |) | |

THE UNITED STATES GRAND JURY CHARGES THAT:

At times relevant to this Indictment:

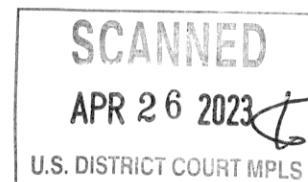
Defendant Deon Necole Williams, a/k/a "Ghost," resided in the State and District of Minnesota.

The Defendant was a member and associate of a criminal organization, namely, the North Minneapolis street gang known as the "Highs." At times relevant to this Indictment, the Highs operated in the District of Minnesota, and elsewhere.

COUNT 1
(Felon in Possession of a Firearm)

On or about November 15, 2022, in the State and District of Minnesota, the defendant,

DEON NECOLE WILLIAMS,
a/k/a "Ghost,"



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having previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year:

| Offense | Place of Conviction | Date of Conviction (On or About) |
|----------------------------------|----------------------------|---|
| Aggravated Robbery | Hennepin County, MN | October 6, 2014 |
| Simple Robbery | Hennepin County, MN | September 4, 2019 |
| Felon in Possession of a Firearm | Hennepin County, MN | January 7, 2021 |

and knowing he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that is, a Smith & Wesson model MP9 9mm semiautomatic pistol bearing serial number HKN3931, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

FORFEITURE ALLEGATION

Count 1 of this Indictment is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c).

As a result of the forgoing offense, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), any firearm or ammunition involved in or used in any knowing violation of Sections 922(g) and 924(a)(8), including a firearm, namely the Smith & Wesson model

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MP9 9mm semiautomatic pistol bearing serial number HKN3931 charged in Count 1 of the Indictment, together with ammunition, all in violation of Title 18, United States Code, Sections 922(g)(1), 924(e)(1), and 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON